

REMARKS

Claims 23-100 are pending in this application. Claims 1-22 and 101-236 were previously withdrawn by the Examiner. Applicants have amended claims 23, 26, 27, 29, 32, 41, 42, 63, 71, 72, 82, 85, 87, 90, 91, and 97-100 to address typographical errors and to more particularly point out and distinctly claim Applicants' portfolio management and analysis techniques. No new matter has been introduced by way of these amendments.

Restriction Requirement

Applicants thank the Examiner for his consideration of Applicants' arguments, and for his joining of claims 23-31 into elected Group II.

Objections to the Specification

The Examiner has objected to the Abstract as containing over 150 words. Applicants have amended the Abstract to the Specification, above. The amended Abstract contains 149 words, and thereby complies with the 150 word limit. Applicants respectfully request that the Examiner withdraw the objection to the Specification.

35 U.S.C. 112, Second Paragraph Claim Rejections

The Examiner has rejected claim 1 as being indefinite. (Office Action dated March 25, 2008, hereinafter "Office Action," p. 3.) Based on the quoted language, and the fact that claim 1 has been withdrawn from examination, it is assumed that the Examiner was addressing claim 32. Applicants have amended claim 32 to recite, "wherein at least two object instances represent data from categories of investments that are different from each other." In addition, Applicants have amended independent claims 63 and 82 in a similar manner, to make them consistent with claim 32.

The Examiner has also rejected claims 41, 42, 71, 72, 90, and 91 as indefinite for lacking antecedent basis. With respect to claims 41, 71, and 90, Applicants have amended these claims to provide proper antecedent basis for the "datasheet." With respect to claims 42, 72, and

91, Applicants have amended these claims to provide proper antecedent basis for “child object instances” and “parent object instances.”

Applicants respectfully request that the Examiner withdraw these rejections in light of these amendments.

35 U.S.C. § 102 Rejections

The Examiner has rejected claims 23-100 under 35 U.S.C § 102(e) as being anticipated by Azuma, U.S. Patent No. 6,954,761 (hereinafter “Azuma”). The Examiner appears to be equating Azuma’s enterprise information filtering system with various aspects of the portfolio management and analysis techniques recited in claims 23-100 and draws the conclusion that, therefore, Azuma somehow teaches, suggests, or motivates Applicants’ claimed invention. Applicants respectfully traverse all these rejections for the reasons discussed in detail below with respect to both the original and amended claims as indicated.

Azuma does not teach at least one aspect of claims 23-31. Specifically, claim 23, before and after amendment, and, by virtue of incorporation, dependent claims 24-31, recite: “a portfolio manager component ... that is structured ... to add to a portfolio representation structure items that correspond to transactions on the portfolio data.”

Azuma does not teach, suggest, or motivate “a portfolio representation structure.” The Examiner asserts that Azuma describes this aspect of claim 23 at column 5, lines 38-52. (Office Action, p. 4.) However, the cited passage generally describes using an input device 10 to generate various types of information, specifically “organization definition information,” “authentication information,” and user information. As discussed in Applicants’ specification, a “portfolio” is used to track or otherwise manage various “investments,” including “portfolios, projects, products, financial assets, equipment, initiatives, operations, applications, processes, activities, human resources,” (Applicants’ Specification, p. 11, lines 16-18.) It is difficult to comprehend how Azuma’s organization definition information, authentication information, and/or user information could be considered a portfolio representation structure. Applicants’ representative has reviewed the remainder of Azuma, and can find no description of something that could be fairly considered “a portfolio representation structure.” Azuma does appear to describe an “organization hierarchy,” which appears to be an organizational chart of employees

within a given enterprise. (Azuma, Figure 3 and column 7, lines 8-13, hereinafter in column#:line# format, e.g., 7:8-13.) However, such a hierarchy does not appear to be a “portfolio representation structure,” as recited by claim 23 and as discussed by Applicants’ Specification as it is not a structure that represents a portfolio. Accordingly, Azuma does not teach, suggest, or motivate “a portfolio representation structure,” as recited by independent claim 23, before and after amendment.

Nonetheless, and not to be interpreted as agreement with the Examiner’s position, Applicants have amended claim 23 to recite, “the portfolio data including financial investments,” which language is recited as part of claim 27. In rejecting claim 27, the Examiner asserts that Azuma describes this aspect at column 5, lines 38-52. (Office Action, p. 5, rejection of claim 27.) However, as noted above, the cited passage generally describes using an input device 10 to generate various types of information. Even if the cited passage describes “portfolio data,” which it does not (as discussed above), the cited passage does not describe “financial investments.” More generally, the organizational hierarchy described by Azuma focuses on employees and their relations to one another, and certainly not on “financial investments” made by an enterprise. Thus, Azuma does not teach, suggest, or motivate, “portfolio data including financial investments,” as recited by amended independent claim 23 and hence claims 24-31.

Also, Azuma does not teach at least one aspect of claims 32-100, before and after amendment. Claim 32 as amended, and, by virtue of incorporation, dependent claims 33-62, recite: “instantiating a hierarchy of object instances, each object instance representing an investment of the organization, wherein at least two object instances represent data from categories of investments that are different from each other.” Claim 63 as amended, and, by virtue of incorporation, dependent claims 64-81, recite: “instantiating a hierarchy of object instances, each object instance representing an investment of the organization, wherein at least two object instances represent data from categories of investments that are different from each other.” Claim 82 as amended, and, by virtue of incorporation, dependent claims 83-100, recite: “instantiate a hierarchy of object instances according to received data, each object instance representing an investment of the organization, wherein at least two object instances represent data from types of investments that are different from each other.” (Emphasis added throughout.)

First, Azuma does not teach, suggest, or motivate “object instance[s] representing an investment of the organization.” The Examiner asserts that Azuma describes this aspect at column 5, lines 38-52. (Office Action, p. 6.) As discussed above with respect to claim 23, the cited passage generally describes the use of an input device 10 to generate various types of information. The cited passage neither describes “object instance” nor “investment of the organization.” While Azuma appears to discuss the use of XML to represent its organizational hierarchy, it does not describe the use of object instances. (See, e.g., Azuma 7:39-44 and Figure 5.) Furthermore, even if Azuma describes “object instances,” which it does not, it does not describe “object instances” that represent an “investment of the organization.” As also discussed above with respect to claim 23, “investments” as recited by Applicants’ claims and described in the Specification, include “portfolios, projects, products, financial assets, equipment, initiatives, operations, applications, processes, activities, human resources,” (Applicants’ Specification, p. 11, lines 16-18.) Azuma’s organization definition information appears to be limited to representing an organizational hierarchy, and does not appear to be capable of representing “investments of the organization.” Thus, Azuma does not teach, suggest, or motivate, “object instance[s] representing an investment of the organization,” as recited by independent claims 32, 63, and 82 and hence claims 33-62, 64-81, and 83-100.

Second, Azuma does not teach, suggest, or motivate “at least two object instances represent data from categories of investments that are different from each other.” Azuma does not appear to be capable of representing “data from categories of investments that are different from each other.” Specifically, as discussed above, Azuma appears to be directed to representing an organizational hierarchy of employees. Thus, even if the employees of Azuma’s organizational hierarchy are considered a first category of “investment,” Azuma does not address, and appears to be unable to represent, data from a second and different category or type of “investment,” such as portfolios, projects, financial assets, equipment, operations, processes, etc. Therefore, Azuma does not teach, suggest, or motivate “at least two object instances represent data from categories of investments that are different from each other,” as recited by independent claims 32, 63, and 82 and hence claims 33-62, 64-81, and 83-100.

Dependent Claims

The dependent claims 23-31, 33-62, 64-81, and 83-100 are not anticipated for at least the reasons discussed above with reference to claims 23, 32, 63, and 82. Furthermore, various of the dependent claims recite additional aspects that are not taught, suggested, or motivated by Azuma. For example, claim 24 recites, “the portfolio data is from heterogeneous data sources.” Neither the passage cited by the Examiner nor the remainder of Azuma appear to describe data from “heterogeneous data sources.” (Office Action, p. 4, citing Azuma, 5:38-52.) As noted above, the cited passage generally describes the use of an input device, which, even if considered a “data source” is certainly not “heterogeneous data sources,” which implies multiple, different types of data sources. Thus, Azuma does not teach, suggest, or motivate at least this aspect of claim 24.

In addition, claim 30 recites, “a meta-object data management system for managing the portfolio representation structure.” Again, neither the passage cited by the Examiner nor the remainder of Azuma describe “a meta-object data management system.” (Office Action, p. 5, citing Azuma 1:19-52.) The cited passage appears to provide an overview of Azuma’s enterprise information filtering system. Neither the cited passage nor Azuma generally discuss “meta-objects,” let alone a meta-object data management system. Thus, Azuma does not teach, suggest, or motivate at least this aspect of claim 30.

Other dependent claim rejections present additional issues. In the interests of expediting prosecution, Applicants are not commenting on each of these at this time. Applicants note for the record that all such assertions are traversed and reserves the right to further present arguments regarding the Examiner’s statements about what is known in the art or taught by the cited references at a later time, should such become necessary. Specifically, no waiver (legal, factual, or otherwise), implicit or explicit, is hereby intended.

Conclusion

For these reasons and others, all of Applicants’ claims 23-100 are not taught, motivated, or suggested by Azuma. Therefore, claims 23-100 are not anticipated or rendered obvious by Azuma.

In view of the foregoing, Applicants submit that all of the claims in this application are allowable over the cited references. In the event the Examiner disagrees or finds minor informalities, Applicants respectfully request a telephone interview to discuss the Examiner's issues and to expeditiously resolve prosecution of this application. Accompanying this Amendment is an Applicant Initiated Interview Request Form in the event the Examiner does not agree that the claims are allowable over the cited references. Applicants' representative can be contacted at (206) 622-4900.

In closing, Applicants respectfully request the Examiner to enter these amendments and to reconsider this application and its early allowance. The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090. Again, Applicants' representative thanks the Examiner for his prompt and courteous attention.

Respectfully submitted,

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Enclosure:

Applicant Initiated Interview Request Form

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